

REMARKS

Claims 1-14 are currently pending in the patent application. The Examiner has rejected Claims 1-4 and 6-14 under 35 USC 102 as being anticipated by Angle; and, has indicated that Claim 5 is allowable, but is objected to as depending from a rejected base claim. Applicants have amended Claims 1, 2, 8 and 9 to address antecedent basis concerns therein. Applicants have amended Claim 12, since it previously recited limitations already found in the claims from which it depends. Claim 12 now parallels the language of allowable Claim 5. No new matter is introduced by the amendments. Applicants believe that all of the claims are patentable over the Angle patent.

The present invention is directed to a method and system for forwarding data packets in a router having a plurality of input ports (114), a plurality of output ports (114) and more than one packet processing unit (PPU 11 to PPU M). The method comprises the steps of first, in response to appearance of a data packet (112) at one of the input ports (114), determining a packet processing unit (PPU 11 to PPU M) of the more than one packet processing units (PPU 11 to PPU M) to handle the processing of the data

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packet; followed by requesting an identification of a respective output port from the determined packet processing unit, wherein the output port is derived by the determined packet processing unit from a piece of packet information indicating where to forward the data packet; and, finally, forwarding the data packet to the identified output port. The output port information is not available in the packet and the determined packet processing unit does not simply read the output port information from the data packet. Rather, the determined packet processing unit derives the output port from available packet information, detailed on page 4 of the Specification as the flow ID and further discussed with reference to the "identifier vector" on page 5 of the Specification. All of the pending claims expressly recite that the packet processing unit derives an output port from information associated with the data packet.

The non-allowed claims have been rejected as being anticipated by the teachings of the Angle patent. The Angle patent teaches a method for providing multicast scheduling of packets for a network device. Angle provides a so-called "fabric configuration manager" through which all packets pass. The fabric configuration manager performs all packet scheduling it its multicast scheduler and unicast scheduler

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(see: Fig. 2). For a multicast packet, in response to receipt of a transmit request at the multicast scheduler of the fabric configuration manager, the scheduler performs a single scheduling iteration consisting of a grant phase, an accept phase and an update phase. In the grant phase, the scheduler grants access to the fabric to one or more input ports, which have corresponding output ports. In the Abstract, Angle expressly teaches that "[t]he transmit request identifies output ports to which pending multicasts cells are ready to be transmitted". Angle reiterates this teaching in Col. 6, lines 62-64, stating that "transmit requests 235 identify the output port(s), if any, to which the corresponding input ports has a cell ready to be transferred."

Applicants respectfully assert that the Angle patent does not anticipate the invention as claimed. Applicants first note that Angle does not teach a router having more than one packet processing unit for deriving an output port from a piece of information associated to each data packet. Angle provides a single fabric configuration manager for all packet processing. Further, the fabric configuration manager of Angle does not derive an output port from a piece of information associated to a data packet. Rather, as

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expressly taught by Angle, incoming transmit requests explicitly identify the output ports to which they are to be directed. The switching fabric of Angle does not derive an output port from available packet information, it simply reads the port identifier.

It is well established under U. S. Patent Law that, for a reference to anticipate claim language under 35 USC 102, that reference must teach each and every claim feature. Since the Angle patent does not teach a router having more than one packet processing unit, does not teach determining one of the more than one packet processing units for handling a packet, does not teach a packet processing unit deriving an output port from available packet information, does not teach requesting identification of an output port from a determined packet processing unit, and does not teach forwarding a data packet based on that derived identification, it cannot be maintained that Angle anticipates the invention as set forth in the independent claims, Claims 1, 8, 13, and 14, or the claims which depend therefrom and add further limitations thereto.

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Based on the foregoing amendments and remarks, Applicants respectfully request entry of the amendments, reconsideration of the amended claim language in light of the remarks, withdrawal of the rejections, and allowance of the claims.

Respectfully submitted,

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